

USEPA/OECA/OC  
State and Tribal Assistance Grant (STAG) 2000-2001  
Kentucky: Public Access to Compliance and  
Enforcement Milestone Events (PACE-  
ME)  
Proposal  
Uploaded to Internet 2/20/03

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**FY 2000 Enforcement and Compliance Assistance Grants**  
**Kentucky Division of Waste Management**  
**February 19, 2001**

**I. Project Information**

- A. State and Department:** Kentucky Department for Environmental Protection,  
Division of Waste Management
- B. Title of Project:** Public Access to Compliance and Enforcement Milestone Events  
(PACE-ME)
- C. Focus Area:** Public Access and Data Quality
- D. Total Funds Requested from EPA:** \$200,000
- E. Total Project Cost:** 200,000 + 46,656 = \$ 246,656
- F. Contact Person:** Abbie Meyer, Supervisor, Administrative Support Section,  
Hazardous Waste Branch. Kentucky Division of Waste Management, 14  
Reilly Road, Frankfort, KY 40601 Phone: (502) 564-6716 Fax: (502) 564  
2705 E-mail: Abbie.Meyer@mail.state.ky.us
- G. Preferred Assistance Agreement:** Cooperative Agreement

**II. Summary**

**A. Summary of problem being addressed:** Currently there is only 1 report available for compliance and enforcement with very few selections from RCRAInfo. Because this new database contains enforcement sensitive information, reports that will be developed in the near future for agency use will not be suitable for distribution to the public under FOIA. However, much of the information maintained in the Compliance and Enforcement Module of RCRAInfo is releasable and could provide important information to the public. The RCRAInfo database will be used nationwide by regulatory agencies to record milestone events making it the best source of comprehensive compliance and enforcement data on the hazardous waste management program. State implementer defined events provide an even more comprehensive view of compliance and enforcement actions.

**B. Summary of Project Goals:**

- To identify any data quality issues that may exist in the compliance and enforcement data by developing data assessment reports. To identify all Significant Non-Compliers (SNC's) in the state and assure that all data is accurately reported in RCRAInfo.
- To identify compliance and enforcement information stored in the RCRAInfo repository that should be accessible to the public that is not considered enforcement sensitive
- To develop standard reports that can be used in any state, for any region or nationwide to report the compliance and enforcement history of either a specific hazardous waste

generator, transporter, recycler, burner/blender or facility or all entities operating nationwide under a specific company name

- To make these reports available on the Internet

### **C. Summary of Project Components:**

- Identify enforcement sensitive data elements in RCRAInfo. Identify data elements from RCRAInfo to support public reports (i.e., applicable Handler information, non-sensitive Compliance and Enforcement information, applicable or clarifying Permitting and Corrective Action information)
- Identify needed reports and develop them in Oracle (Version 8). Reports under consideration include:
  - "Old" RCRIS reports (see attached screen prints)
    - Evaluations from the Comprehensive Compliance and Enforcement Pull
    - Violation and Enforcement Action Report
    - Violation and Enforcement Report for Universe Selection
    - Enforcement Action Report
    - Violation Report for Reconciliation
    - Report of Enforcement Actions Not Linked to Any Violations
    - SNCs Without Subsequent Formal Enforcement Action
    - Uninspected Facilities Report
  - Data quality evaluation reports for use by states - note that some data assessment reports are covered under the "Old RCRIS Reports"
    - Data conversion/reports to allow RCRAInfo to track the actual ID Numbers for transporters who have been assigned "dummy" ID Number in multiple states (reference activity-location field).
  - Nationwide summaries by company name sorted by violation type, SNC vs. SV status, penalties assessed/paid, etc.
  - Nationwide summary reports by violation sorted by days out of compliance, penalties assessed/paid, etc.
  - Test reporting software
  - Place reports on the main EPA Internet site and recommend links for regions and states

**D. Summary of How the Project Components Will Address the Problems and Attain the Goals:** The main project components require data analysis and report development, testing and providing a platform to make the reports accessible widely to the public. The project components satisfy the project goals.

## **III. Work Plan**

### **A. Planned Activities**

- Organize a task force with members from EPA Headquarters and Region IV and state representatives from both an enforcement program and a RCRAInfo data management perspective. This group will make recommendations based on experience and review contractor work to ensure the quality of the final outcome. This group will test the developed reports to ensure accuracy of the selection

criteria, readability and overall quality of the reports. In addition, they will review the web-based application to ensure its' ease of use by members of the public. The following individuals have agreed to serve on the task force:

- Debra Goodwin, US EPA, Data Management Branch, Office of Compliance
- Dave Gray, US EPA-Region IV (Data management perspective)
- Larry Lamberth, US EPA-Region IV (Compliance perspective)
- Linda Shearer, Kentucky (Data management perspective)
- Rick Kelsey, Alabama (Compliance perspective)
- Verona Barnes, Georgia (Data & compliance perspective)
- Request that EPA-Region IV retain the project funds and obtain the services of a competent contractor (letter attached to grant application). For ease of administration, the contractor will also be expected to reimburse task force members for travel associated with the project. Development of the reports will require expertise in Oracle and the RCRAInfo data structure, the hazardous waste management program, and the needs of the public. Selecting a competent contractor is critical to the success of the project.
- Develop a project schedule that identifies end products and submittal dates, review timeframes, comment and response formats and timeframes, approval criteria for the final product, etc. Distribute to the task force and provide to the contractor to ensure timeliness of the project commitments.
- Prepare and submit quarterly progress reports to allow appropriate oversight of the grant agreement. Payment to the contractor will be based upon reported progress and will be initiated by EPA Region IV project officer.
- Work with HQ's staff on developing or adding to the EPA Web page a section for compliance/enforcement reports for public use.  
Develop a short presentation on the project for the RCRAInfo Annual Conference to publicize and ensure wide use of the final product.

#### **B. Measures**

- The success of the program will be measured quarterly as progress reports are filed with the EPA Region IV project officer.
- The ultimate success of the project will be realized with the placement of reports for public access on the EPA Internet site

#### **C. Sharing Results**

- The results from this project will be made available on the Internet to ensure access by the public as well as by all state agencies and regions. To publicize the availability of these reports, a short presentation will be developed for the Annual RCRAInfo Conference held by the US EPA.

### **V. Project Milestones**

A. Grant award - Day 0

B. Selection of task force members - Day 30

C. Concurrence by the task force on enforcement-sensitive information and critical data to provide for the public - Day 60

- D. Selection of a competent contractor by EPA - Day 60
- E. Development of preliminary reports - Day 200
- F. Completion of testing on preliminary reports - Day 270
- G. Finalization of reports - Day 365
- H. Placement of the reporting software on the EPA web-page - Day 390
- I. Notice to all regions and states that the reports are available for immediate use  
- Day 390
- J. Presentation to the Annual RCRAInfo Conference - when scheduled (2002  
2003)

**V. Project Costs**

A. In-kind services provided by the Kentucky Division of Waste Management include

- Staff time - Environmental Control Supervisor (*45 days*), Environmental Technician 111 (*45 days*), Enforcement Section Supervisor (*15 days*), and Specialized Computer Resource Staff (*15 days*) to develop and coordinate the project. Estimated hours are noted in (*italics*). Total value committed to the project: \$46,656
- Resources - the Kentucky Division of Waste Management will provide meeting facilities, workspace and access to computers as needed for contractors.

B. Contractor Support - \$170,000 (2000 hours @ \$85/hour) with \$30,000 additional dollars, earmarked for contractor reimbursement of task force travel to attend meetings = total \$200,000